

Document Log Item

Addressing	
From	To
David Stensby/R9/USEPA/US	"Janda, Danielle L CIV NAVFAC SW" <danielle.janda@navy.mil>
CC	BCC
"Clark, David J CIV NAVFAC SW" <david.j.clark2@navy.mil> "Sullivan, James B CIV NAVFACHQ, BRAC PMO" <james.b.sullivan2@navy.mil> "Myriam Zech" <mzech@waterboards.ca.gov> "Remedios Sunga" <rsunga@dtsc.ca.gov> "Miya, Ryan@DTSC" <Ryan.Miya@dtsc.ca.gov>	
Description Form Used: Memo	
Subject	Date/Time
RE: Comments on the Draft Groundwater Sampling Annual Status Report, IR Site 21, 24, and 32, Treasure Island	07/12/2012 10:41 AM
# of Attachments	Total Bytes
0	10,032
NPM	Contributor
Processing	
Comments	

Body

Document Body

Danielle,

EPA does not have any comments on the Subject Report.

-----"Janda, Danielle L CIV NAVFAC SW" <danielle.janda@navy.mil> wrote: -----

To: David Stensby/R9/USEPA/US@EPA, "Myriam Zech" <mzech@waterboards.ca.gov>, "Miya, Ryan@DTSC" <Ryan.Miya@dtsc.ca.gov>

From: "Janda, Danielle L CIV NAVFAC SW" <danielle.janda@navy.mil>

Date: 07/12/2012 09:25AM

Cc: "Remedios Sunga" <rsunga@dtsc.ca.gov>, "Sullivan, James B CIV NAVFACHQ, BRAC PMO" <james.b.sullivan2@navy.mil>, "Clark, David J CIV NAVFAC SW" <david.j.clark2@navy.mil>

Subject: RE: Comments on the Draft Groundwater Sampling Annual Status Report, IR Site 21, 24, and 32, Treasure Island

Hi Myriam, David and Ryan,

Did you have any comments on the Draft Groundwater Sampling Annual Status Report for IR Sites 21, 24 and 32?

V/r,

Danielle Janda

(619) 532-0796

-----Original Message-----

From: Warner, Scott [<mailto:Scott.Warner@amec.com>]

Sent: Monday, July 09, 2012 22:05

To: Sullivan, James B CIV NAVFACHQ, BRAC PMO; Clark, David J CIV NAVFAC SW; Janda, Danielle L CIV NAVFAC SW

Cc: Remedios Sunga; Michael.Tymoff@sfgov.org;

Kelly.Pretzer@sfgov.org; William Carson; Myriam Zech; Beck, Jessica; stensby.david@epa.gov

Subject: Comments on the Draft Groundwater Sampling Annual Status Report, IR Site 21, 24, and 32, Treasure Island

Dear Jim, David, and Danielle.

AMEC Environment & Infrastructure, on behalf of the TIDA, has prepared the following comments on the subject report: Draft Groundwater Sampling Annual Status Report, Installation Restoration Site 21, 24 and Site 32, Former Naval Station

Treasure Island, San Francisco, California, June 2012. We trust these will be useful and appreciate working with the team on this project. Please contact me if you have any questions. Regards, Scott

1. Title Page. Please indicate if the work was performed under the supervision of a California Registered PE or PG.

2. Executive Summary. This Executive Summary contains no summary of the water quality results from the monitoring program. It appears as if a full portion of this Executive Summary has been omitted following the summary of field activities performed. Please add a summary of results, with conclusions as appropriate for this section.

3. Page 1-1, Section 1.1, Second paragraph. The sentence "the groundwater sampling results could lead to each site receiving a "No Further Action" status is vague and appears oversimplified.

Sampling results alone do not lead to an NFA designation which is the responsibility solely for the regulatory agency.

This sentence also seems out of place and does not add to the discussion. Suggest deleting.

4. Page 1-1 and 1-2, Section 1.1 Last paragraph and list of laboratory analyses. Please add specific EPA test methods to each of the bullets shown to assist with completeness.

5. Page 2-2, Section 2.2, First Paragraph, 5thSentence.

This sentence describing groundwater level monitoring and tidal influence is not clear. This sentence may not actually be needed as long as a note is provided in the data table and under conclusions if the influence impacts the assessment of the site conditions.

6. Page 2-2, Section 2.2. Following the 2ndParagraph, please indicate that groundwater elevations were calculated from the

water level depth measurements based on the current datum (please identify the specific datum utilized).

7. Page 2-3, Last Paragraph, Third Bullet. The first sentence is unclear, perhaps a phrase or word is missing for the sentence ".pump was installed in the well, connected tubing to it." This entire paragraph could be rewritten for clarity. Also, please indicate quantitative values that define "excessive drawdown" with respect to pumping and recovery prior to sampling. How was the very low flow rate during purging (i.e., 60 to 100 milliliters per minute) measured? Please review and modify this entire paragraph.

8. Page 3-4, First paragraph. Please provide a list of those compounds that did not exceed remedial goals (within the opening sentence); otherwise, the paragraph and list lacks clarity and is difficult to follow.

9. Section 4.0, Summary and Conclusions. Please expand sections 4.1 and 4.2, specifically, to include a "path forward" or similar discussion that follows up on the results presented.

For both IR Sites 21 and 24, geochemical conditions, whether the increase in sulfate, persistence of arsenic, high methane in places, or persistence of and increase in daughter VOCs warrant an assessment as to the next steps. Even if the proposal is to continue monitoring, the plan for the following year (which now is half way complete) should be included in this section of the report. Please comment on each of the primary parameters or parameter categories as listed at the start of the document in Section 1.1.

10. Figure 10. The highest persistent VOC concentrations in samples from wells that, at least for the annual groundwater elevation monitoring event, represent the lowest potentiometric surface level between the shoreline and interior of the site.

Please add some explanation as to whether this condition is important to the overall remediation progress (consider adding this explanation to 4.1 for IR 21).

Scott D. Warner, CHG, CEG
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